

Jurist, Karen

From: Jeffrey Cotsifas <cotsifas@pacificecorisk.com>
Sent: Wednesday, October 19, 2016 11:10 AM
To: Christian, Elizabeth@Waterboards
Cc: Goeden, Brenda@BCDC; Debra O'Leary; Ross, Brian; Siu, Jennifer; James Mazza
Subject: Re: LRTC

Everyone,

Thank you for getting back to me so quickly. LRTC is in the process of getting the condition survey performed. As soon as I have the information, I will forward it over.

Regards,

Jeff

Jeffrey Cotsifas
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On Oct 19, 2016, at 9:28 AM, Christian, Elizabeth@Waterboards
<Elizabeth.Christian@waterboards.ca.gov> wrote:

The current multi-year WQC that expires with the USACE permit on 12/31/18 allows knockdowns. The key piece of information I need to approve knockdown of such a small volume is the condition survey. Like Brenda said, it has to show area immediately adjacent to the shoal that is deep enough to completely contain the shoal material within the permitted dredge footprint. I would also want to see a discussion of BMPs, which could include a silt curtain, that could be used to minimize the release of resuspended sediment outside the permitted footprint. At this point, I don't think testing is necessary, but I'd like to see on the survey exactly where in the dredge footprint the knockdown would happen in relation to past sampling/testing information before giving a final thumb up.
Beth

From: Goeden, Brenda@BCDC
Sent: Tuesday, October 18, 2016 12:57 PM
To: Jeffrey Cotsifas; Debra O'Leary; Christian, Elizabeth@Waterboards; Ross, Brian; Siu, Jennifer; James Mazza
Subject: Re: LRTC

Hi Jeff,

Thanks for the email and description of the shoaling issue. On the face of it, I would say, yes, a knockdown would be appropriate, especially since its a pretty small shoal. We would want to see that there is an immediately adjacent deeper water site within the permitted dredge footprint. However, because the 2012 sediment testing revealed high levels of PCB, DDT and

moderately elevated levels of PAHs, and no further testing after the last dredge event, I am not entirely sure this is the way the group would go, especially being so close to the Heckathorn site. We have in the past authorized knockdowns where there were some contaminants, but not this high of level. Would Levin be willing to consider using a silt curtain during the operation to minimize the spread of suspended sediments during the knockdown? If they were, I would be inclined to allow it, based on the assumption that the more contaminated sediments have been removed during the last episode, the concept that the next dredging episode would test for and remove the sediment knockdown and the silt curtain would contain spread of the contamination.

What do others think?

Brenda

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From: Jeff Cotsifas <Cotsifas@pacificecorisk.com>
Date: Tuesday, October 18, 2016 12:40 PM
To: "O'Leary, Debra A SPN" <Debra.A.O'Leary@usace.army.mil>
Cc: Brenda Goeden <brenda.goeden@bcdca.gov>, "Christian, Elizabeth@Waterboards" <Elizabeth.Christian@waterboards.ca.gov>, "Ross, Brian" <ross.brian@epa.gov>
Subject: Re: LRTC

Debra/Brenda/Beth/Brian,

I just received a call from the Levin Richmond Terminal Corporation staff and they indicated that they had just been informed by the shipping company using LRTC's Berth A that there is a small area of sediment shoaling at the face of the berth. They are guesstimating ~200-300 cubic yards of material and are in the process of obtaining a condition survey. They are permitted to perform knockdowns, and this would seem to be the the best way to deal with the issue. The last testing was performed in 2012 (attached). Would the current data suffice for approval of such as small knockdown, or would sampling and testing need to be performed, similar to what IMTT did in 2014. Also, timings is obviously an issue since the permitted work window closes November 30th. Is there a regulatory mechanism that would allow LRTC to perform the knockdown outside of the work window in the event any needed sampling and testing results would not be obtained prior to the close of the work window?

Regards,

Jeff

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